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VIA HAND DELIVERY

Clerk's Office

District Court of New Jersey
Clarkson S. Fisher U.S. Court House
402 East State Street
Room 2020
Trenton, NJ 08608

R E C E I V E D

SEP 30 2022

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

Re: Zangara v. National Board of Medical Examiners Civil No. 3:22-cv-01559-GC-LHG

Dear Sir/ Madam,

Please accept this letter, to the Clerk's office as my Opposition to the Defendants request for an extension of time(Dkt. No.22) (See Exhibit A) to respond to my current motion for a preliminary Injunction filed on September 26, 2022 (Dkt. No. 19) The grounds for this are as follows:

(1) The "rule" that they have cited L.Civ.R. 6.1(b) has nothing to do with a request for more time to answer a motion, let alone **a motion filed pursuant to Rule 65 where a moving part is alleging irreparable harm**, it has to do with filing an answer to a complaint. **They know what the rule is used for as they used it already before** (See Exhibit B) As I'm reading *New Jersey Federal Practice Rules* published by Gann Law Books I see that it clearly states in the commentary to the rule:

*3. "Breathing Room "Rule. As amended in 2010 L.Civ.R. 6.1(b), the "breathing room" rule, allows a party to obtain an essentially automatic 14-day extension of time to answer or reply to **a complaint**" (See Exhibit C)*

They are aware of this and "trying to pull a fast one" on the staff of your office as this rule has nothing to do with motion practice. I resent the fact, and so should your staff, that Defendants think we are so careless that we won't actually read the rule.

(2) The second reason their request should not be granted is that I am not aware of any court rule that allows the **clerk's office to overrule the order of the presiding judge**. As the order in the computer states:

TEXT ORDER: The Court is in receipt of Plaintiff's Motion for a Preliminary Injunction. (ECF No. 19.) Defendant shall respond on or before October 10, 2022, and Plaintiff shall reply to Defendant's response on or before October 17, 2022. **So Ordered by Judge Georgette Castner on 9/26/2022. (adi,) (Entered: 09/26/2022)**

The initials of "adi" most likely stands for "Ann Dello Iacono" who is Judge Castner's "Courtroom Deputy" according to the website so this was entered directly in her chambers. Therefore I do not believe the Clerk's office could overturn this order, only the Circuit Court could do that.

(3) Rule 65 does not allow for any extensions, as the whole point of the motion is to be heard as soon as possible. This is because the moment is experiencing "irreparable harm" which is a prerequisite for filing and succeeding on the motion.

(4). Lastly, the simple fact is that Defendants had the standard 14 days. I did not ask for any "extensions" to reply to their motions because the court rules do not allow for that. I had to work nonstop to meet my 14 day deadline, I had to skip some meals, I had to ignore everything else in the world for 14 days, I had to give up most of my sleep to respond to them. They have 1,500+ attorneys in their firm. Their revenue is \$1.1 Billion and these guys do this for their career. It should not take them a month to respond to someone who's not even an attorney when they have an army with unlimited resources and I am one person with a computer and Google. I met the 14 day deadline, so should they. Let their attorneys sleep in their home office like I did to make it work. The time is 10:41pm right now, and I'm typing this.

I would also like to point out again, that I received the automated email from this office last night, **but again I was not sent the same by Defendants.** They have a history of doing this to me, which is obstructing my ability to respond to the Clerk's Office or the Judge. If you recall in my last correspondence I explained that I was served on a Friday after your office closed and they assumed that I would not drive to the courthouse to oppose their motion first thing Monday morning. In any event, they have apparently attempted to do the same again today. However, I am not going to address this further as I am sure that this is noticed by your office and the judge's chambers when I bring it to your attention and you take this into consideration when necessary.

For all of these reasons, Defendants request for an extension of time should be denied. The purpose of this litigation is so that I can finish Medical School, it does not need to be held up by the Defendants that are unprepared or too lazy to meet a 14 day deadline. If this matter gets forwarded to the judge, please treat this as my opposition before her also.

Please advise if you have any questions or require any additional information from me. Thank you for your immediate attention to this matter.

Very truly yours,



**Jason A. Zangara, Pro Se
Attorney for Plaintiff**

**Cc: Honorable Georgette Castner (Via Hand Delivery / Clerk's Office)
Adam Mandelsberg, Attorney for Defendants, (Via Regular Mail)**